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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSE ALEXANDER ESCOBAR,
Plaintiff

v.

UNITED STATES OF AMERICA; DOES I
through XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,
Defendant

Case No: 2:22-cv-01419-CDS-DJA

**ORDER GRANTING STIPULATION
FOR CONTINUANCE OF JOINT
PRE-TRIAL ORDER DEADLINE**
(Second Request)

[ECF No. 14]

Plaintiff Jose Alexander Escobar and Defendant United States of America, by and through their undersigned counsel, hereby agree and stipulate to extend the deadline to file the joint pretrial order from August 7, 2023, to September 7, 2023. This is the second request to extend the deadline for the joint pretrial order. The basis for the requested extension is set forth below in the Declaration of Daniel C. Tetreault, Esq., counsel for Plaintiff Jose Alexander Escobar.

Discovery closed in this matter on May 8, 2023. The joint pretrial order is currently due on July 7, 2023. The reason for this stipulation is that the parties are currently in settlement

1 discussions, and the joint pretrial order will be unnecessary if the parties reach a settlement in
2 this case.

3
4 **DECLARATION OF DANIEL C. TETREAULT, ESQ IN SUPPORT OF REQUEST TO**
5 **CONTINUE DEADLINE FOR JOINT PRE-TRIAL ORDER**

6 DANIEL C. TETREAULT, ESQ., being first duly sworn, deposes and says:

7 1. I am an attorney duly licensed to practice law in the State of Nevada, and in the
8 federal District Court in and for the District of Nevada. I am counsel for Plaintiff,
9 JOSE ALEXANDER ESCOBAR, in Case No. 2:22-cv-01419-CDS-DJA, and I have
10 personal knowledge of the facts offered herein;

11 2. I joined Plaintiff's law firm on July 17, 2023. Since that time, I was been
12 actively getting familiarized with the facts and procedural postures of the respective case load
13 assigned to me;

14 3. One of those cases was the instant matter, styled as *Escobar v. United States*. It
15 is my understanding that there were active settlement discussions between the United States
16 and former counsel for Plaintiff;

17 4. I have been in contact with counsel for the United States, Stephen
18 Hanson, regarding the current posture of settlement discussions, and I have been actively
19 attempting to contact and convey the offer to Plaintiff in an attempt to determine whether this
20 matter may be resolved;

21 5. Therefore, the parties respectfully request an additional thirty (30) day
22 extension to the deadline to file the Joint Pre-Trial Order, until **September 7, 2023**.

23 6. That I make this Declaration under penalty of perjury and attest to the truth of
24 all matters stated herein.

25 FURTHER DECLARANT SAYETH NAUGHT.

26 DATED this 3rd day of August 2023.

27 /s/ Daniel C. Tetreault
28 DANIEL C. TETREAULT, ESQ.



1 For the foregoing reasons, the parties stipulate to extend the deadline for the joint pretrial
2 order to **September 7, 2023**.

3 Respectfully submitted this 3rd day of August 2023.

4
5 DATED this 3rd day of August 2023.

DATED this 3rd day of August 2023.

6 **LADAH LAW FIRM**

JASON M. FRIERSON

United States Attorney

7 */s/ Ramzy P. Ladah*

/s/ Stephen R. Hanson II

8 **RAMZY P. LADAH, ESQ.**

9 Nevada Bar No. 11405

DANIEL C. TETREAULT, ESQ.

10 Nevada Bar No. 11473

11 517 S. Third Street

12 Las Vegas, NV 89101

Attorneys for Plaintiff

STEPHEN R. HANSON II, ESQ.

Assistant United States Attorney

13 **IT IS SO ORDERED.**

14
15
16 
United States District Judge

Dated: August 4, 2023

LADAH LAW
FIRM

